

ATTACHMENT 3 PERSONNEL TRAINING

Personnel Training

Below is a description of Institute Plant's RCRA training program.

Outline of Training

The Institute Plant maintains a Training Department which facilitates the Plant's training needs. These needs include Plant- wide and unit specific programs, which also includes RCRA training. These programs, along with on-the-job training and supervision, provides the employee with the level of training required to perform their job in a safe and effective manner.

Personnel trained includes the Institute Plant RCRA Coordinator, the Unit Environmental Representatives, the Plant's Emergency Response Squad, those who actively manage the Plant's RCRA facilities, and those who conduct routine operations involving hazardous waste. The level and content of the training is dependent upon the person's job requirements, job description, and level of knowledge/skill required to adequately perform their RCRA function.

Further details on the training elements as they apply to RCRA are outlined below.

Job Title/Job Description

Plant employee information is maintained by the Plant's Training Department to ensure personnel receive the appropriate training at the appropriate frequency. The Plant maintains a computer-based system and other records to identify each individual's Job Title(s), training frequency, and training level required. This system ensures that employees associated with a hazardous waste facility receives the appropriate level of RCRA training.

Training Content, Frequency, and Technique

Training is provided in conjunction with the Plant's Environmental Protection Department, the Plant's Training Department, and the Unit Environmental Representatives. Outside RCRA training companies or professionals may also be used to assist or provide the necessary training.

Content of the training varies depending on the employee's required knowledge level. For example, a Unit Environmental Representative receives more training on RCRA regulations (classification of waste, container and

labeling requirements, land disposal restrictions, etc.), whereas a facility operator receives more specific RCRA training to address each facility's day-to-day operations (e.g. inspections, proper operations, etc.). Emergency response personnel receives more RCRA emergency response/contingency plan training.

All appropriate facility personnel receive annual RCRA training. A variety of training methods can be used. These methods could include; video, audio, lecture presentations, reading assignments, CD ROM, and any combinations.

Training Director

The Plant's RCRA Coordinator has overall responsibility for the Plant's RCRA training program. This individual's duties includes overseeing the Plant's RCRA program, providing routine RCRA guidance and interpretation, and administering the Part B permit. The Coordinator receives on-the-job training as well as RCRA class room training.

Relevance of Training to Job Position

See the Training Content, Frequency, and Technique Section above.

Training for Emergency Response

The Plant's Emergency Organization has it's own Emergency Squad consisting of approximate 100 members capable of responding 24 hours a day. This Squad is responsible for responding to Plant emergencies resulting from fires, explosions, releases, and other similar incidents. Also, the Plant's Emergency Organization is response for ensuring that the Plant's emergency response equipment (fire trucks, fire-water monitors, release responsible equipment, etc.) is operational and properly maintained.

Annually, Emergency Squad members receive extensive training on proper emergency response techniques and the requirements of the Plant's Emergency Response Manual (Section G, Attachment G-1-1). In addition, the Squad receives annual RCRA training to ensure that they properly handle and manage any incident involving hazardous waste.

Implementation of Training Program

Appropriate RCRA training is provided within six months of a person's employment or assignment to a hazardous waste facility. Employees assigned to a Plant RCRA facility will not work in unsupervised positions until completing the appropriate RCRA training requirements. Job titles and job descriptions of each employee are maintained at the facility in accordance with 40 CFR 264.16(d). Minimum qualification

requirements for each employee are also maintained at the facility pursuant to 40 CFR 264.16(d)(3).

Training records are maintained in accordance with 40 CFR 264.16(e).